

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

SHARMAINE MALLET, ET AL :  
VERSUS : CIVIL ACTION NO.: 6:19-CV-00427  
OFFICER JASON GEANS, ET AL : JUDGE SUMMERHAYS,  
MAG. JUDGE HANNA

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**ANSWER TO AMENDED COMPLAINT**  
**OF SHARMAINE MALLET, ON BEHALF OF HER MINOR CHILD, B.M.**

NOW INTO COURT, through undersigned counsel, come and appear OFFICER JASON GEANS, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS A POLICE OFFICER FOR THE CITY OF CARENCRO; OFFICER JAMES MITCHELL, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS A POLICE OFFICER FOR THE CITY OF CARENCRO; and the CITY OF CARENCRO who, in answer to the Amended Complaint filed by Sharmaine Mallet, on behalf of her minor child, B.M., plaintiff in this matter, aver as follows:

1.

The allegations of paragraph 1 of the plaintiff's Amended Complaint are denied.

2.

The allegations of paragraph 2 of the plaintiff's Amended Complaint are denied.

3.

The allegations of paragraph 3 of the plaintiff's Amended Complaint are denied.

4.

The allegations of paragraph 4 of the plaintiff's Amended Complaint are denied.

5.

The allegations contained in the paragraph beginning “WHEREFORE” of the Amended Complaint are denied.

AND NOW, and further answering, the defendants, OFFICER JASON GEANS, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS A POLICE OFFICER FOR THE CITY OF CARENCRO; OFFICER JAMES MITCHELL, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS A POLICE OFFICER FOR THE CITY OF CARENCRO; and the CITY OF CARENCRO, reiterate and reaver any and all allegations, exceptions and defenses that they made in their original answer or any other pleading.

WHEREFORE, premises considered, the defendants, OFFICER JASON GEANS, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS A POLICE OFFICER FOR THE CITY OF CARENCRO; OFFICER JAMES MITCHELL, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS A POLICE OFFICER FOR THE CITY OF CARENCRO; and the CITY OF CARENCRO, pray that this answer be deemed good and sufficient and after all legal delays and due proceedings are had, that there be judgment rendered herein in favor of the defendants, OFFICER JASON GEANS, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS A POLICE OFFICER FOR THE CITY OF CARENCRO; OFFICER JAMES MITCHELL, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS A POLICE OFFICER FOR THE CITY OF CARENCRO; and the CITY OF CARENCRO, and against the plaintiff, Sharmaine Mallet, on behalf of her minor child, B.M., at plaintiff’s costs.

AND FOR ALL GENERAL AND EQUITABLE RELIEF, ETC.

BORNE, WILKES & RABALAIS, L.L.C.

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ATTORNEYS FOR OFFICER JASON GEANS,  
INDIVIDUALLY AND IN HIS OFFICIAL  
CAPACITY AS A POLICE OFFICER FOR THE CITY  
OF CARENCRO; OFFICER JAMES MITCHELL,  
INDIVIDUALLY AND IN HIS OFFICIAL  
CAPACITY AS A POLICE OFFICER FOR THE CITY  
OF CARENCRO; and the CITY OF CARENCRO

CERTIFICATE

I HEREBY CERTIFY that on November 30, 2020, a copy of the foregoing Answer to Amended Complaint of Sharmaine Mallet, on behalf of her minor child, B.M., was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to Peter Dudley, Christopher Shows, and L. Clayton Burgess by operation of the court's electronic filing system. I also certify that I have this date mailed by United States Postal Service this filing to the following non-CM/ECF participant, L. Richard Roy, III.

s/Joy C. Rabalais  
JOY C. RABALAIS (Bar Roll #26476)  
BORNE, WILKES & RABALAIS, L.L.C.  
Attorney for Defendants